

Comments and Responses on ARC 7367B
Addition of State-Funded Family Planning Coverage
Received December 10, 2008

The following persons and organizations provided written comments, which are included in the summary below:

Mary O'Brien, Visiting Nurse Services, Des Moines
Janet Peterson, RN, MHA, interim family planning coordinator, Iowa Dept. of Public Health
Southern Iowa Family Planning, Inc., Ottumwa
Jodi Tomlonovic, executive director, Family Planning Council of Iowa, Des Moines

Client Eligibility

COMMENT: The intent of the legislation was to provide coverage for women who are eligible under 441-subrule 75.1(41) except for documentation of citizenship and identity, enrollment in credible health insurance coverage, and age. We request that the proposed rules be amended to add age to the list in 87.2(1)f. (Tomlonovic, Peterson)

RESPONSE: We agree and have amended the rules as suggested.

COMMENT: We have concluded that the most beneficial part of the new chapter would be our patients' whom have health insurance and would be able to apply. However, we do not feel we have a surplus amount of patients that are unable to provide proof of citizenship or identity. We do not feel this would be a very beneficial exception. It would be a benefit to us to enable this when patients do not have financial capabilities to request copies of their citizenship or are just unable to obtain proof. However...we do not have very many patients that fall into that category. (So. Ia. Fam. Plan.)

RESPONSE: To enable more women to receive free family planning services, this program will not exclude those who are unable to provide documentation of U.S. citizenship and identity; have health insurance coverage; and do not meet the Iowa Family Planning Network age requirements.

Agency Eligibility

COMMENT: Under Section 441--87.3(1) Place of filing, please change to "An application may be filed at any family planning agency or delegate agency." Delete the rest of the sentence "that provided family planning services as of July 1, 2004, or later." This last clause is not necessary since FP agency and delegate agency are both defined in the definitions section at the beginning of the chapter. Also, this last clause is redundant and invites confusion as to the intent of the statement. (Peterson, O'Brien)

RESPONSE: Subrule 87.3(1) has been changed to read, "An application may be filed at any family planning agency."